THE STATES TO SELECT THE SECOND SECON

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8 999 18TH STREET - SUITE 500 DENVER, CO 80202-2466 http://www.epa.gov/region08

Ref: 8EPR-EP

Nettie H. Myers, Secretary Department of Environment and Natural Resources Joe Foss Building 523 East Capitol Pierre, South Dakota 57501-3181

Re: Section 303(d) Total Maximum Daily

Load (TMDL) Waterbody List

Dear Ms. Myers:

Thank you for your submittal of South Dakota's 1998 Clean Water Act Section 303(d) waterbody list. EPA has conducted a complete review of this waterbody list dated March 31, 1998 with corrections dated April 7, 1998 as well as the supporting documentation and information. Based on this review, EPA has determined that South Dakota's 1998 list of water quality limited segments (WQLSs) still requiring TMDLs meets the requirements of Section 303(d) of the Clean Water Act ("CWA" or "the Act") and EPA's implementing regulations. Therefore, by this order, EPA hereby APPROVES South Dakota's Section 303(d) list. The statutory and regulatory requirements, and a summary of EPA's review of South Dakota's compliance with each requirement, are described in the enclosure.

EPA's approval of South Dakota's Section 303(d) list extends to all waterbodies on the list with the exception of those waters that are within Indian Country, as defined in 18 U.S.C. Section 1151. EPA is taking no action to approve or disapprove the State's list with respect to those waters at this time. EPA, or eligible Indian Tribes, as appropriate, will retain responsibilities under Section 303(d) for those waters.

The State described its public participation process for development of the Section 303(d) waterbody list in its submittal. We wish to acknowledge the thoroughness of South Dakota's effort to solicit data and information from a wide range of entities and to request public comment on the draft waterbody list. The process to solicit public input included public notices, public meetings, mailings to interested parties, and the posting of the draft §303(d) waterbody list on South Dakota's Internet site.

EPA has also received South Dakota's long-term schedule for TMDL development for all waters on the 1998 list. EPA acknowledges and appreciates receipt of this schedule. The State's

schedule provides for the development of TMDLs for all the pollutants of concern for all the waters on the 1998 waterbody list within 13 years. Further discussion of this schedule will be forthcoming in a separate letter to you in the near future.

The State of South Dakota has continued to provide a quality assessment of its waters. We appreciate the time and care your staff has taken in developing the §303(d) list of waters. In particular, we are especially thankful for the hard work from the members of your staff to put together a well organized and thorough document. We wish to continue our support in your efforts to develop TMDLs for the waters identified on the list.

Again, thank you for the efforts related to the excellent job of developing the §303(d) TMDL waterbody list for the 1998-2000 biennium. If you have questions on any of the above information, feel free to give me or Bruce Zander (303/312-6846) of my staff a call.

Sincerely,

Max H. Dodson, Assistant Regional Administrator Office of Ecosystems Protection and Remediation

Enclosure

Review of South Dakota's 1998 Section 303(d) Waterbody List

Attachment to July 15, 1998 letter from Max H. Dodson, Assistant Regional Administrator,
Office of Ecosystems Protection and Remediation, US EPA, Region VIII to
Nettie H. Myers, Secretary, Department of Environment and Natural Resources

Date of Transmittal Letter from State: March 31, 1998
Date of Receipt by EPA: April 1, 1998
Date of State Corrections to List: April 7, 1998

Purpose

The purpose of this review document is to describe the rationale for EPA's approval of South Dakota's 1998 Section 303(d) waterbody list. The following sections identify those key elements to be included in the list submittal based on the Clean Water Act and EPA regulations (see 40 C.F.R. 130.7). EPA reviewed the methodology used by the State in developing the §303(d) list and the State's description of the data and information it considered. EPA's review of South Dakota's §303(d) list is based on EPA's analysis of whether the State reasonably considered existing and readily available water quality-related data and information and reasonably identified waters required to be listed.

Statutory and Regulatory Background

Section 303(d)(1) of the Act directs States to identify those waters within its jurisdiction for which effluent limitations required by Section 301(b)(1)(A) and (B) are not stringent enough to implement any applicable water quality standard, and to establish a priority ranking for such waters, taking into account the severity of the pollution and the uses to be made of such waters. The Section 303(d) listing requirement applies to waters impaired by point and/or nonpoint sources, pursuant to EPA's long-standing interpretation of Section 303(d).

EPA regulations provide that States do not need to list waters where the following controls are adequate to implement applicable standards: (1) technology-based effluent limitations required by the Act, (2) more stringent effluent limitations required by State or local authority, and (3) other pollution control requirements required by State, local, or federal authority. See 40 C.F.R. 130.7(b)(1).

In developing Section 303(d) lists, States are required to assemble and evaluate all existing and readily available water quality-related data and information, including, at a minimum, consideration of existing and readily available data and information about the following categories of waters: (1) waters identified as partially meeting or not meeting designated uses, or as threatened, in the State's most recent Section 305(b) report; (2) waters for which dilution calculations or predictive modeling indicate nonattainment of applicable standards; (3) waters for

which water quality problems have been reported by governmental agencies, members of the public, or academic institutions; and (4) waters identified as impaired or threatened in any Section 319 nonpoint assessment submitted to EPA. See 40 C.F.R. 130.7(b)(5). In addition to these minimum categories, States are required to consider any other data and information that is existing and readily available. EPA's 1991 Guidance for Water Quality-Based Decisions describes categories of water quality-related data and information that may be existing and readily available. See Guidance for Water Quality-Based Decisions: The TMDL Process, EPA Office of Water, 1991, Appendix C ("EPA's 1991 Guidance"). While States are required to evaluate all existing and readily available water quality-related data and information, States may decide to rely or not rely on particular data or information in determining whether to list particular waters.

In addition to requiring States to assemble and evaluate all existing and readily available water quality-related data and information, EPA regulations at 40 C.F.R. 130.7(b)(6) require States to include as part of their submissions to EPA documentation to support decisions to rely or not rely on particular data and information and decisions to list or not list waters. Such documentation needs to include, at a minimum, the following information: (1) a description of the methodology used to develop the list; (2) a description of the data and information used to identify waters; and (3) any other reasonable information requested by the Region.

###

Review of South Dakota's Submission

A. Description of the methodology used to develop the list. $(\S130.7(b)(6)(i))$

The methodology used by the State to develop its list is documented starting on page 6 of the submittal. The types of waters listed, minimum data requirements, stream assessment methodologies, lake assessment methodologies, and prioritization of TMDL waters are all discussed in this section. The State made a distinction between assessment of streams and lakes because the lake methodology focused on trophic state and its relationship to the support or nonsupport of beneficial uses while the stream methodology focused on the chemical and physical aspects. For all waters, the State generally evaluated the information and data that met the established Minimum Data Requirements (see page 8 of State submittal for Requirements) and compared the results to the State water quality standards. These minimum data requirements included provisions related to the age of data, the quality assurance/quality control provisions associated with the collection and analysis of samples, and other sampling requirements as found in the South Dakota Surface Water Quality Standards. Also, the State established criteria and thresholds for how the data were used to identify waters not meeting or not expected to meet State standards. For example, for metals data, the State took a conservative approach in identifying waters to be listed in that its current water quality standards are based on the dissolved fraction of metals concentrations, whereas the §303(d) list methodology relied on the total metals concentrations to determine impairment status of waterbodies.

For the purpose of consistency between the §303(d) waterbody list and other water

programs, the State considered information from the Clean Lakes program (§314 program), the nonpoint source program (§319 program) and the NPDES discharge permit program as a basis for identifying waters to be put on the §303(d) list.

The State organized its Section 303(d) list in the following manner:

- . waters identified as impaired based on §305(b) assessment as well as those waters reported as impaired by government, the public, and academic institutions;
- . waters where new or updated TMDLs are needed in support of NPDES repermitting actions;
- . waters associated with nonpoint source §319 projects.

The State included high quality maps as part of its submittal which provide the location of §303(d) waters. The prioritization of each of the waters is also indicated on the maps.

South Dakota properly listed waters with nonpoint sources causing or expected to cause impairment, consistent with Section 303(d) and EPA guidance. Section 303(d) lists are to include all WQLSs still needing TMDLs, regardless of whether the source of the impairment is a point and/or nonpoint source. EPA's long-standing interpretation is that Section 303(d) applies to waters impacted by point and/or nonpoint sources. This interpretation has been described in EPA guidance, most recently in a 1997 memorandum clarifying certain requirements for 1998 Section 303(d) lists. See EPA's April 1991 Guidance and August 27, 1997 EPA guidance listed below. In addition, this interpretation of Section 303(d) is described in detail in a May 23, 1997, memorandum from Geoffrey Grubbs, Director of the Assessment and Watershed Protection Division, EPA Office of Water, to the FACA Workgroup on Section 303(d) Listing Criteria. See Memorandum from Geoffrey H. Grubbs, Director, Assessment and Watershed Protection Division, to FACA Workgroup on Section 303(d) Listing Criteria, "Nonpoint Sources and Section 303(d) Listing Requirements", May 23, 1997. See also Memorandum from Robert Perciasepe, Assistant Administrator, Office of Water, to Regional Administrators and Regional Water Division Directors, "New Policies for Establishing and Implementing TMDLs," August 8, 1997.

EPA has reviewed the State's methodology used to develop its Section 303(d) list and finds that methodology reasonable and sufficient for purposes of Section 303(d).

B. Description of the data and information used to identify waters, including a description of the data and information used by the state as required by section 130.7(b)(5). (§130.7(b)(6)(ii))

The State relied primarily on data obtained from its ninety-six water quality monitoring stations, data and information obtained through assessments performed under its §319 nonpoint source programs, and data obtained as a result of its public participation process. The State actively solicited a wide range of entities for data and information by sending out over 60 letters to state, private, tribal, citizen, industrial, agricultural, academic, and federal groups. The State considered all data obtained from this effort in the §303(d) list development.

. Waters identified by the State in its most recent section 305(b) report as "partially meeting" or "not meeting" designated uses or as "threatened" (§130.7(b)(5)(i))

The State waters included in the most recent §305(b) report (1996) that were identified as "not supporting", "partially supporting," or "threatened" were included on the §303(d) list unless subsequent data showed water quality improvements such that waters were no longer impaired or no evidence meeting the Minimum Data Requirements was available to support its listing as impaired. The State provided a waterbody-by-waterbody accounting of waters that were identified in the 1996 §305(b) report and not on the 1998 §303(d) list. For these waters, the pollutant of concern, the particular segment, the watershed, and the basis for excluding the waterbody from the list are given in a table entitled "Waters Specifically Excluded from the 1998 TMDL Waters List." This table also includes waters that were not on the final §303(d) list but were recommended for listing by a public or private entity.

. Waters for which dilution calculations or predictive models indicate nonattainment of applicable water quality standards (§130.7(b)(5)(ii))

All waters for which NPDES discharge permits are expiring between April 1, 1998 and March 31, 2000 and are expected to require an updated TMDL in conjunction with a re-permitting action are on the 1998 §303(d) list. The likelihood that these waters will need an updated TMDL is very high; thus, South Dakota chose to include them on the §303(d) list of waters in need of (new or updated) TMDLs. The listing of these waters and the State's conclusion that new or updated TMDLs are needed, is supported primarily by the past and anticipated results of dilution calculations and predictive modeling.

. Waters for which water quality problems have been reported by local, state, or federal agencies; members of the public; or academic institutions (§130.7(b)(5)(iii))

The State made a wide solicitation for data and information in preparation of the \$303(d) list. The information and data sent to the State was considered in the list development. If the State relied on such data or information to list a water, the source of the data or information is noted on the \$303(d) list under the heading "Information to Support Listing". If data or information was received by the State, and the State considered such data or information but determined it was not appropriate to rely on in developing the Section 303(d) list, then the State documented its rationale for not relying on that data or information in either a table within the report (See "Waters Specifically Excluded from the 1998 TMDL Waters List") or in the Summary of Public Comments in Appendix B of the submittal.

. Waters identified by the State as impaired or threatened in a nonpoint assessment submitted to EPA under section 319 of the CWA or in any updates of the assessment (§130.7(b)(5)(iv))

The State has been involved in watershed assessment and implementation activities since the late 1970's. In recent years, the State has relied more heavily on the §319 program and the assessment effort supporting the §319 program to identify water quality concerns. The State's §303(d) list reflects the results of the §319 assessments by including all waters targeted for §319 project implementation. Further, the State also listed waters beyond the waters scheduled for implementation of Section 319 projects where data existed to support the conclusion that nonpoint source pollution problems causing exceedences or expected exceedences of water quality standards exist.

EPA has reviewed South Dakota's description of the data and information it considered for identifying waters on the §303(d) list, as well as a number of information and data sources within EPA Region VIII's files. In particular, EPA reviewed water quality data downloaded from STORET, reports, and memoranda related to water quality in South Dakota that were in Region VIII files (see references for April 22, 1998 and April 25, 1998 below). Any questions EPA identified as a result of this review were addressed by the State and appropriate explanations or responses were given by the State.

EPA concludes that the State properly assembled and evaluated all existing and readily available data and information, including data and information relating to the categories of waters specified in 40 C.F.R. 130.7(b)(5).

C. A rationale for any decision to not use any existing and readily available data and information for any one of the categories of waters as described in §130.7(b)(5) (§130.7(b)(6)(iii))

For purposes of developing a technically sound and defensible waterbody list, the State developed minimum requirements for data as described on page 8 of the State's submittal. The State relied on all existing and readily available data and information that met these minimum requirements in developing its §303(d) list. For data and information that did not meet these minimum requirements, the State made a case-by-case determination whether to rely on such data or information in developing its list. If data and information were not used as a basis for listing a particular waterbody, the segment-specific reason for that rejection is documented under the column "Basis for exclusion from 1998 list" or footnotes in the table "Waters not Targeted for TMDLs."

EPA has reviewed the State's rationale for not using certain data and information and concludes that such rationale is reasonable and sufficient for purposes of Section 303(d). EPA finds it reasonable in the context of §303(d) listing to exclude data and information on the basis of quality control purposes, trend information, and age of data because such factors are consistent with factors suggested in EPA's §305(b) guidance. (See the September 1997 document listed below which is the primary EPA guidance on methods to analyze data to identify water quality impairments and threats.)

D. Any other reasonable information requested by Regional Administrator. (§130.7(b)(6)(iv))

Information requested by EPA Region VIII included 1) a written description of the State's monitoring strategy, 2) a detailed description of the State's water quality monitoring sites, 3) a list of specific entities that were solicited for data and information during the §303(d) list development process, and 4) a list of specific entities that were mailed a copy of the draft §303(d) list for comment. Further, there was a meeting conducted in Pierre, SD between EPA and DENR (April 24, 1998) to review the components of the §303(d) submittal. As part of that review, EPA raised questions pertaining to data in STORET on Whitetail Creek, Whitewood Creek, and Belle Fouche. The State provided a review of the discrete data from STORET related to these waters and explained why the data was used to either serve as a basis for listing waters or for excluding the waters from the final §303(d) list.

The State was asked to include in its submission to EPA an explanation of what waters on its 1996 list have been delisted and the reason for the delisting. South Dakota has included this information in Appendix D of it submission. In that Appendix, the 1996 list is provided with an identification of what waters were delisted and the reason for the delisting. Such reasons included the delisting of waters based on the completion TMDLs, the elimination of pollutant sources causing impairments, and new information based on updated modeling showing no further impairments.

The State has provided adequate responses to all the information requests from the Regional office during the course of the Region's review of its final §303(d) list.

E. Prioritization of waters on the list taking into account the severity of the pollution and the uses to be made of such waters; the prioritization shall specifically include the identification of waters targeted for TMDL development in the next two years (§130.7(b)(4)

EPA regulations interpret the requirement in Section 303(d)(1)(A) of the Clean Water Act that States establish a priority ranking for listed waters. The regulations at 40 C.F.R. 130.7(b)(4) require States to prioritize waters on their Section 303(d) lists for TMDL development and also to identify those WQLSs targeted for TMDL development in the next two years. In prioritizing and targeting waters, States must, at a minimum, take into account the severity of the pollution and the uses to be made of such waters. See Section 303(d)(1)(A). As long as these factors are taken into account, the Act provides that States establish priorities. States may consider other factors relevant to prioritizing waters for TMDL development, including immediate programmatic needs, vulnerability of particular waters as aquatic habitats, recreational, economic, and aesthetic importance of particular waters, degree of public interest and support, and state or national policies and priorities. See 57 Fed. Reg. at 33040, 33045 (July 24, 1992), and EPA's April 1991 Guidance listed below.

The State described its prioritization method on pages 15 and 16 of the submittal. Further, the waters targeted for TMDL development in the next two years are identified in the table "1998-2000 Biennium Targeted TMDL Waters."

EPA reviewed the State's priority ranking of listed waters for TMDL development, and

concludes that the State properly took into account the severity of pollution and the uses to be made of such waters, as well as other relevant factors such as local support, programmatic requirements, trend information, human-induced vs. naturally-induced impairments, and the amount of data indicating impairments. According to EPA guidance, a State may elect to use additional criteria to prioritize its §303(d) waterbody list (See Guidance for Water Quality-Based Decisions: The TMDL Process, EPA Office of Water, 1991, pages 13,14).

In addition, EPA reviewed the State's identification of WQLSs targeted for TMDL development in the next two years and concludes that the targeted waters are appropriate for TMDL development in this time frame. The targeting of waters was based on the prioritization of the waterbody as well as the level of progress in certain watershed efforts and programmatic requirements (e.g. re-authorization of NPDES discharge permits).

Waters that were targeted for TMDL development during the 1996 - 1998 biennium but did not have TMDLs developed for them are included as waters targeted for TMDL development in 1998 - 2000. For most of these waters, the TMDL was targeted for 1996 - 1998 because it was expected to be developed in the context of an NPDES permit reissuance. These TMDLs were not developed in that time frame becasue the re-permitting action was not completed in 1996 - 1998 due to unanticipated complexities in the cours or re-permitting. The State has included these waters in those targeted for TKMDL devleopment in 1998 - 2000 becasue it expects the re-permitting action to be completed in that time frame.

EPA has found the waterbody prioritization and targeting method used by South Dakota as reasonable and sufficient for purposes of Section 303(d).

F. Identification of the pollutants causing or expected to cause violation of the applicable water quality standards (§130.7(b)(4))

The State identified the pollutants causing or expected to cause violation of the applicable water quality standards, including those pollutants that have no corresponding numeric criteria in the State standards (e.g. sediment). The State's identification of the pollutants is found on the separate tables that make up the §303(d) list. If the specific pollutant causing the impairment cannot be identified, but the category of pollutant is known (e.g. metals), then the category is identified. This is consistent with EPA guidance for development of the 1998 list (See EPA's National Clarifying Guidance for 1998 Section 303(d) Lists, Aug. 27, 1997). Further, the State used the "Trophic State Index" (TSI) as a means to identify pollutants for lakes. The TSI is an index of trophic status and it considers phosphorus concentrations, secchi disk depth readings, and chlorophyll-*a* concentrations.

EPA concludes that the State has appropriately identified pollutants causing or expected to cause violations of the applicable water quality standards.

G. Documents used in review of South Dakota's §303(d) waterbody submittal

The following list of documents were used directly or indirectly as a basis for EPA's review of the State's §303(d) waterbody list. This list is not meant to be an exhaustive list of all records, but to provide the primary documents the Region relied upon in making its decisions to approve the State's list.

December 28, 1978 Federal Register Notice, *Total Maximum Daily Loads Under Clean Water Act*, finalizing EPA's identification of pollutants suitable for TMDL calculations, 43 Fed. Reg. 60662

January 11, 1985 Federal Register Notice, 40 C.F.R. Parts 35 and 130, Water Quality Planning and Management: Final Rule, 50 Fed. Reg. 1774

April 1991, "Guidance for Water Quality-Based Decisions: The TMDL Process," EPA 440/4-91-001.

July 24, 1992 Federal Register Notice, 40 C.F.R. Parts 122, 123, 130, revision of regulation, 57 Fed. Reg. 33040

August 13, 1992 memorandum from Geoffrey Grubbs, Director, Assessment and Watershed Protection Division, Office of Water, EPA Headquarters, to EPA Water Quality Branch Chiefs, Regions I - X and TMDL Coordinators, Regions I - X, regarding "Supplemental Guidance on Section 303(d) Implementation."

October 30, 1992 memorandum from Geoffrey Grubbs, Director, Assessment and Watershed Protection Division, Office of Water, EPA Headquarters, to Water Quality Branch Chiefs, Regions I - X, regarding "Approval of 303(d) Lists, Promulgation Schedules/Procedures, Public Participation."

November 26, 1993 memorandum from Geoffrey Grubbs, Director, Assessment and Watershed Protection Division, Office of Water, EPA Headquarters, to Water Quality Branch Chiefs, Regions I - X, and TMDL Coordinators, Regions I - X, regarding "Guidance for 1994 Section 303(d) Lists."

40 C.F.R. Part 130 Water Quality Planning and Management

1996 report from South Dakota Department of Environment and Natural Resources entitled <u>The</u> 1996 South Dakota Report to Congress; 305(b) Water Quality Assessment

August 1996 document from South Dakota Department of Environment and Natural Resources entitled <u>Air and Surface Water's Ambient Water Quality Monitoring Stations</u>

May 23, 1997 memorandum from Geoffrey H. Grubbs, Director, Assessment and Watershed Protection Division, Headquarters, US EPA to FACA Workgroup on Section 303(d) Listing Criteria regarding "Nonpoint Sources and Section 303(d) Listing Requirements."

July 22, 23; 1997 agenda and presentation notes from the TMDL Workshop; EPA Region VIII States & Tribes (Denver, Colorado).

August 27, 1997 memorandum from Robert H. Wayland III, Director, Office Wetlands, Oceans, and Watershed, Office of Water, EPA Headquarters, to Water Division Directors, Regions I - X, and Directors, Great Water Body Programs, and Water Quality Branch chiefs, Regions I - X, regarding "National Clarifying Guidance For 1998 State and Territory Section 303(d) Listing Decisions."

September, 1997 guidance from Office of Water, Headquarters, US EPA regarding <u>Guidelines for Preparation of the Comprehensive State Water Quality Assessments (305(b) Reports) and Electronic Updates: Supplement, EPA-841-B-97-002B</u>

September 12, 1997 letter from Carol L. Campbell, Director, Ecosystems Protection Program, Office of Ecosystems Protection & Remediation, US EPA, Region VIII to Steve Pirner, Director, Division of Environmental Regulation, South Dakota Department of Environment and Natural Resources regarding "Transmittal of TMDL Guidance."

December 22, 1997 letter from Nettie H. Myers, Secretary, South Dakota Department of Environment and Natural Resources to Bruce Zander, US EPA, Region VIII regarding "Request for water quality data relating to impaired waterbodies" (letter sent out to multiple parties).

December 22, 1997 mailing list from South Dakota Department of Environment and Natural Resources regarding "Request for data for 1998 303(d) list development (sic)"

January 27, 1998 presentation notes from Bruce Zander, US EPA, Region VIII, from the Region VIII 305(b) Coordinators' Meeting entitled "Relationship Between Section 303(d) & Section 305(b)."

February 4, 1998 letter from Max H. Dodson, Assistant Regional Administrator, Office of Ecosystems Protection and Remediation, US EPA, Region VIII to J. David Holm, Director, Water Quality Control Division, Colorado Department of Public Health and Environment and Region VIII Water Quality Directors (including Steve Pirner, Director, Division of Environmental Regulation, South Dakota Department of Environment & Natural Resources) regarding "303(d) Listing Requirements; Expiring Permits."

February 18, 1998 mailing list from South Dakota Department of Environment and Natural Resources regarding "Address List for Announcement of Draft 303(d) Lis (sic)"

March 2, 1998 letter from Joan Bortnem (SDDENR) and Lonnie Steinke (SDDENR) to Bruce Zander (US EPA, Region VIII) transmitting a draft 1998 South Dakota 303(d) list

March 27, 1998 letter from Debra Eiland (Earthlaw) to Carol M. Browner, Administrator,

USEPA, and William P. Yellowtail, Regional Administrator, Region VIII, regarding "EPA's Failure to Perform Nondiscretionary Duties under the Clean Water Act, 33 U.S.C. §1313(d)."

March 31, 1998 303(d) letter from Nettie H. Myers, Secretary, South Dakota Department of Environment and Natural Resources, to William Yellowtail, Administrator, US Environmental Protection Agency (Region VIII) transmitting <u>The 1998 South Dakota 303(d) Waterbody List and Supporting Documentation</u>

April 7, 1998 note from Lonnie Steinke (SDDENR - Pierre) to Bruce Zander (EPA TMDL Program, Region VIII - Denver) transmitting corrected pages to the March 31, 1998 303(d) waterbody list submittal (changes to pages 25, B-7 - B-12)

April 7, 1998 letter from Jack R. Cole (Citizens To Restore Terry Peak Mountain) to Bruce Zander (EPA, Region VIII) transmitting comments from Citizens To Restore Terry Peak Mountain to SDDENR regarding the draft 303(d) waterbody list

April 22, 1998 table from Toney Ott (US EPA, Region VIII) listing relevant documents pertaining to South Dakota Black Hills Data - DRAFT including written notations

April 23, 1998 handwritten note from Bill Wuerthele "B." (US EPA, Region VIII) to Bruce Zander (US EPA, Region VIII) regarding comments on South Dakota water quality standards as included in the South Dakota 303(d) waterbody submittal

April 25, 1998 memo from Bruce Zander (US EPA, Region VIII) to File regarding Review of S Dakota 303(d) 1998 Waterbody List including STORET water quality data summary sheets

April 29, 1998 FAX memorandum from Lonnie Steinke (SDDENR - Pierre) to Bruce Zander (EPA TMDL Program, Region VIII - Denver) regarding "A Summary of Surface Water Quality Monitoring Efforts of the South Dakota Department of Environment and Natural Resources."

FCD: April 30, 1998, baz, baz, F:\ZANDER\TMDL\98_apprv.sdf